

As an interpreter who works in VRS, and as the recruiter for one of the agencies which provides VRS interpreters, I would like to comment on the FNPRM which seeks comment on setting a speed of answer rule for VRS and setting a requirement for VRS providers to offer service on a 24/7 basis.

In regard to the question of whether or not a speed of answer requirement should be adopted for VRS, I think it is imperative that the FCC remember that this will add a great deal of financial burden to the VRS providers. The providers would need to provide additional interpreters in order to ensure that the calls do not sit in queue for longer than the allotted time. As you know, interpreters are much more expensive to provide than the traditional CA's. It would be unreasonable to set a speed of answer that is equal to that of TRS, unless the funding for VRS was increased. If a speed of answer is to be set for VRS at this time, it would have to be much more flexible than the current TRS standard.

Along the same line, making VRS a 24/7 service would pose the same problems. Clearly, if a profit could be made by providing service 24/7, the providers would already be doing it. I believe strongly that the Deaf consumers should have the right to make a phone call that is functionally equivalent to a hearing person's call on a 24/7 basis. However, the only way to do this would be to set the rate at which VRS providers are reimbursed at a higher level.

I would also like to point out that if the FCC were to establish these requirements without increasing the reimbursement rate, they would make it nearly impossible for the smaller companies to continue to compete. While large companies such as Sprint, AT&T, and Sorenson may be able to continue providing services while not making a profit for a long period of time, smaller companies are less able to do so. It is my understanding that the FCC would like to encourage smaller companies to enter and remain in this market. I hope that this will be taken into consideration when making this decision.

At the same time, regardless of the decision that is made on these issues, it is essential that the FCC do whatever is in it's power to encourage the funding of interpreter training programs around the country. There is already a shortage of community interpreters in many areas, and the inevitable growth of VRS can only serve to worsen this shortage. Since it takes most people a minimum of four years of full-time study to prepare to be a professional interpreter, work needs to be done right away to begin preparing more interpreters to fill the shoes of those who will be moving into VRS.

Thank you for taking the time to read and consider my opinion.